

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION PLAINTIFFS’ MOTION TO SEVER, GRANT MOTION FOR
ATTORNEY’S FEES, GRANT MOTION FOR SANCTIONS, AND
ENTER FINAL JUDGMENT ON SEVERED CLAIMS**

Pursuant to Rule 21 of the Federal Rules of Civil Procedure, the Coalition Plaintiffs move the Court to sever the “DRE Claims,” as hereafter defined, from the “Post-DRE Claims,” as hereafter defined, which severance will create two cases (the “DRE Case” and the “Post-DRE Case”); to grant the Coalition Plaintiffs’ Motion for Attorney’s fees in the DRE Case (Doc. 595); to Grant Plaintiffs’ Joint Motion for Sanctions in the DRE Case (Doc. 623); and to enter final judgment in the DRE Case.

For purpose of this Motion, the DRE Claims are the claims set forth in the Coalition Plaintiffs’ Third Amended Complaint (the “TAC,” Doc. 226) challenging the constitutionality of the DRE/GEMS system. Importantly, the DRE Claims are not defined to include the TAC’s claims to the extent they relate to the State’s voter registration database, electronic pollbooks, and paper pollbook backups that

are the subject of this Court's Order dated September 28, 2020 (Doc. 918), since those components have continued to be used with the BMD system that followed the DRE/GEMS system.

For purpose of this Motion, the Post-DRE Claims are all the claims that are not DRE Claims, including all of the claims asserted in the Coalition Plaintiffs' First Supplemental Complaint (Doc. 628).

The Coalition Plaintiffs have filed herewith a Brief in Support of this Motion.

Respectfully submitted this 6th day of October, 2021.

/s/ Bruce P. Brown

Bruce P. Brown
Georgia Bar No. 064460
BRUCE P. BROWN LAW LLC
1123 Zonolite Rd. NE
Suite 6
Atlanta, Georgia 30306
(404) 386-6856

/s/ Robert A. McGuire, III

Robert A. McGuire, III
Admitted Pro Hac Vice
(ECF No. 125)
ROBERT MCGUIRE LAW FIRM
113 Cherry St. #86685
Seattle, Washington 98104-2205
(253) 267-8530

Counsel for Coalition for Good Governance

/s/ Cary Ichter

Cary Ichter
Georgia Bar No. 382515
ICHTER DAVIS LLC
3340 Peachtree Road NE
Suite 1530
Atlanta, Georgia 30326
(404) 869-7600

*Counsel for William Digges III, Laura Digges,
Ricardo Davis & Megan Missett*

CERTIFICATE OF COMPLIANCE AND SERVICE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

I also certify that on October 6, 2021, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Bruce P. Brown
Bruce P. Brown